

### REMARKS

Claims 1-29 and 31-34 are all the claims pending in the application. Reconsideration and allowance of claims 1-29 and 31-34 are respectfully requested in view of the following remarks.

#### **I. Summary of the Office Action**

Claims 1-9, 13-23, and 27-29 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application No. 2003/0069848 to Larson et al. (hereinafter "Larson") in view of U.S. Patent Application No. 2003/0217110 to Weiss (hereinafter "Weiss"). Claims 10-12, 24-26, and 31-34 are rejected under 35 U.S.C. 103(a) as being unpatentable over Larson and Weiss and further in view of U.S. Patent No. 5,907,696 to Stilwell et al. (hereinafter "Stilwell").

#### **II. Prior Art Rejection**

Independent claims 1, 14, 25 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Larson in view of Weiss. Applicants respectfully traverse this rejection because the references fail to teach or suggest all of the elements as set forth and arranged in the claims.

Specifically, claim 1 recites

processing means [which] comprise an interpreter which is provided with **a plurality of conversion rules**, arranged in the form of scripts that are interpreted by the interpreter and are **associated with a plurality of different primary event formats**, and arranged so as to convert, by means of said rules, primary data received in one of said primary formats into secondary data in said secondary format which can be processed by said management device, and wherein **each of the plurality of different primary event formats corresponds to a particular script** (emphasis added).

The Examiner acknowledges that Larson does not disclose “a plurality of conversion rules . . . associated with a plurality of different primary event formats . . . [and] each of the plurality of different primary even formats corresponds to a particular script,” as recited in claim

1. *See* page 3 of the Office Action. However, the Examiner contends that Weiss teaches the above-noted unique feature of claim 1. *See* page 4 of the Office Action.

Weiss relates to

A home gateway server appliance . . . allowing home computers and other network electronic devices to communicate with one another . . . wherein the network server provides functionalities chosen from the group consisting of . . . SNMP, . . . **Perl scripting** and security monitoring. . . . The present server appliance 10 is composed of . . . and audible alarm system 20 **notifying** users of a communication or network **event** . . . a user may specify some action taken to communicate with a client device of some sort for some event . . . **each event** to be monitored **need only be associated with one script file**, and there need also be only one script file **for each available alarm** (emphasis added).

*See* Abstract, paragraphs [0002], [0030], [0093] and [0094]. In other words, Weiss teaches the use of a plurality of script files, each script file being associated with exactly one event that needs to be monitored. For example, “[a]ctual initiation of . . . alarms will depend upon the specific event initiating the alarm . . . [t]he particular script for fetchmail would only contain a line executing an alarm script, most likely playing a particular sound file.” *See* paragraph [0095].

The Examiner contends that Larson teaches the use of conversion scripts, but “the conversion is one-to-one occurring from SNMP to XML.” *See* page 3 of the Office Action. Further, the Examiner alleges that because “Larson and Weiss teach methods of converting events, it would have been obvious to one skilled in the art to substitute one method for the other

to achieve the predictable result of being able to convert a plurality of event formats via a common used practice in the art.” *See* page 4 of the Office Action. Applicants respectfully disagree with the Examiner’s position.

First, there is no rationale to combine the Larson and Weiss references. Applicants submit that the Examiner’s stated rationale to combine Larson and Weiss (*see* page 4 of the Office Action) cannot be supported. If one would substitute the single script of Larson, which generates XML RPC based on SNMP traps (*see* Larson at paragraph [0129]) with the plurality of scripts in Weiss, which are associated with exactly one event, such a combination would still not disclose or suggest a plurality of conversion rules arranged in particular scripts and corresponding to a plurality of different primary events, as recited in claim 1.

To the contrary, such a substitution might add to the teachings of Larson, if at all, a plurality of scripts corresponding to single alarm events (and not to a plurality of events as required in claim 1). In other words, a particular script executes a particular alarm, *i.e.*, playing a particular sound file, for example. *See* paragraph [0095].

Second, the Examiner contends that Larson teaches a conversion which “is one-to-one occurring from SNMP to XML.” *See* page 3 of the Office Action. In other words, the single script in Larson converts a certain SNMP trap to an XML event. As discussed above, although Weiss teaches a plurality of scripts, these scripts contain only one line, namely the command to execute a certain alarm script which plays a certain sound file. *See* paragraph [0095]. In other words, such a conversion is also a one-to-one conversion from one event to one alarm, similar to the teachings of Larson. Furthermore, Weiss teaches that in practice, each event to be monitored need only be associated with one script file (*see* paragraph [0098] which is similar to the one script file taught by Larson. By contrast, claim 1 requires a plurality of conversion rules being

associated with a plurality of different event formats. Therefore, a person of ordinary skill in the art would not have been motivated to combine these two references because such a combination would result in one or the other design of a one-to-one conversion of events.

Independent claims 14, 15 and 28 recite analogous features as claim 1. As a result, Larson in view of Weiss does not teach or suggest all of the elements as set forth and arranged in independent claims 1, 14, 15 and 28. Therefore, Applicants respectfully requests that the rejection of claims 1, 14, 15 and 28 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

Stilwell does not remedy the deficiencies of Larson in view of Weiss. Claims 2, 10-13, 16-27, 29 and 31-34 depend from claims 1, 15 and 28, respectively, and are patentable at least by virtue of their dependencies.

### **III. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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